

PERSONAL DATA PROTECTION PRIVACY POLICY

Privacy message

UAB "Rubineta" (hereinafter – "we" or "Data manager") are the managers of this website. With this privacy policy, we determine and explain how is your personal data collected and then managed while using this website or while you contact us in any other way. The conditions, set out this privacy policy are applied each time when you would like to contact the content and/or service we provide, without any regard to the type of device (computer, mobile phone, tablet, TV, etc.) you are using

We hereby confirm, that your data will be collected according to the requirements of the effective legal acts of the European Union and the Republic of Lithuania, as well as the orders of controlling institutions, and that all reasonable technical and organizational/administrative measures will be applied, so that the data we collect about the visitors of our webpage would be protected from being lost, used in an unauthorized way and/or modified. The data manager's employees have agreed not to disclose or disseminate the information they receive at their workplace to any third parties, including the information regarding the visitors of the webpages/social network accounts, in writing.

The concepts used in the Rules are understood and explained in the same way they are described in the General data protection Regulation No. 2016/679 (EU).

It is very important for you to read this privacy policy, **since each time you visit this webpage you are agreeing with the conditions set henceforth. In case you do not agree with these conditions, please refrain from visiting our webpage and do not use our content and/or services.**

Who are we?

UAB "Rubineta", legal person's code 124949547, address: Savanoriu av. 180, LT-03154, Vilnius is acting as the Data manager. This means that UAB "Rubineta" decides how and for what reasons your personal data is managed.

Your personal data – what is it?

Personal data is data, which is related to the natural person, it can be used to clearly identify that natural person, especially when the personal data is the name and surname, address, telephone number, e-mail address, credit or debit card number, information about special help. Identification is possible only according to the information or together with other information, which should or could be received by the data manager.

How are we collecting information about you?

Your personal data, i.e. any information about you that can identify you, is received in various ways:

You can personally provide us your personal data directly. It usually happens in cases when:

- You provide us with your data in order to receive information regarding our services/products/partners;
- You provide your applications, orders/requests or claims;

- You order our newsletter or other type of communication;
- You participate in surveys.

Information about you can be collected automatically. It usually happens in the following cases:

- You provide requests through our social network accounts;
- You use our website (data collected through the use of cookies and similar technologies);
- You make public entries on social network platforms, which we follow;
- You visit us in our premises, which are surveilled with the help of video cameras.

In some cases, we can receive information about you from third parties. We can also collect information about you from publicly available sources (i.e. our partners, which provide services to you or us, through social networks, at your company webpage or in other ways.

We can collect information about you in other cases, which are not discussed in these privacy rules. If this is the case, we will additionally inform you.

The purposes for which we manage your personal data with a corresponding legal basis and the reasons for data management:

- **Service and product orders/requests administration** (legal basis: the execution of our mutual agreement, execution of legal act requirements; personal data: name, surname, telephone number, e-mail address, address, other information, payment type information, which can be needed during the provision of services).
- **Ensuring property and personal safety (video surveillance in internal premises)** (legal basis: lawful interest, ensuring property and personal safety; personal data: video image).
- **Ensuring client service quality and client satisfaction survey analysis** (legal basis: lawful interest: ensuring client service quality; service improvement, website operation improvement, assessing how good are our advertising campaigns working, or adapting services according to your requests. We collect the following personal data for these purposes: e-mail address and the content of correspondence, contact information).
- In order to **send you newsletters**. We collect the following personal data for these purposes: name and surname, e-mail address, contact information;
- **For marketing purposes** – advertisement and sponsor content provision, sending messages regarding actions, our market, client, product and service analysis and assessment, including the collection of your opinion on services and organizing client surveys (legal basis: we manage your personal data for these purposes with a legal interest: informing about our services, events, news and other relevant information, Your agreement; personal data: name, surname, social network data, telephone, e-mail address, address).
- **Informing related to your request regarding services, partners or goods** (legal basis: information provision related to the legal interest to provide correct information regarding the services provided by us or our partners, additionally provided services and other reasons; personal data: in order to reply to your requests by telephone, social network environment, by e-mail or in other ways we can ask of your telephone number, your residential address, e-mail address or other contact data that you find comfortable to be contacted through).
- In order to **protect our interests in court or other institution** (legal basis: execution of legal act requirements, legal interest – to protect from submitted claims and lawsuits; personal data:

depending on the submitted claim or lawsuit. We may manage all of your personal data, specified in these privacy policies, for this purpose).

- So that we can **execute mandatory applied law provisions**. For this purpose, we collect the following data of yours: personal data related to immigration and customs control, personal data, related to invoices, data, and personal data related to logistics and our obligations in case of transportation disruption or delay.

In cases when we will not be able to rely on one of the aforementioned legal bases, we will ask of your permission prior to starting to manage your personal data (such cases will be clear and defined by circumstances and context).

In cases when we will manage your personal data due to purposes other than specified in these rules, we will inform you about that by providing a separate message (notification).

Note. We hereby inform you that we have the right to send advertising information by e-mail regarding other similar products or services of ours to our clients or persons who have registered at our webpage, and you have the right to refuse to receive the direct marketing content we send you now or at any other time, by informing us of your decision by e-mail: info@rubineta.com or administracija@rubineta.com or by using a refusal link in the newsletter itself.

Who do we pass your personal data?

We can send your personal data to:

- Companies, which provide us with services at our request;
- IT companies, which provide us with services;
- Banks/companies, which help us to proceed with settlement operations;
- Companies, which help us to organize competitions/actions;
- Other responsibly chosen business partners;
- Law enforcement institutions;
- Other parties, whenever it is required from us by laws or it is needed to protect our lawful interests.

What do we do to protect your information?

We have installed sensible and corresponding physical and technical measures to protect the information we are collecting for the purposes of content/service provision.

How long are we going to keep your personal data?

Your personal data will be kept by us for the amount of time we need to achieve the specified objective. After that objective will be achieved, your personal data is deleted, with the exception of cases when legal acts oblige us to keep the information for tax purposes or the data might be needed for the execution of a pre-trial investigation, however in any case the period we keep your data for cannot be longer than 10 years (with the exception of periods, specified in the legal acts of the Republic of Lithuania). At the end of this term, the data will be deleted in a way, so that it cannot be reproduced.

Your rights

The data subject, whose data is managed at the Data manager activities, depending on the situation, has the following rights:

- *To know (to be informed) regarding the management of his data (**the right to know**)*. You have the right to receive information regarding the management of your information in a concise, simple and understandable language, prior to the management of your data;
- *To familiarize with your data and how it is being managed (**the right to familiarize**)*. This right means a consent (approval) that we manage your data, your personal data list provision, the provision of the objectives and the legal basis of your data management, a consent regarding the sending of your data to third parties, and if we do so, what safety measures we take, the provision of the source of your personal data and the period, during which we keep your personal data. After identifying you, we will provide the aforementioned information with a condition that it will not harm other persons' rights and liberties.
- *To demand to correct, or, taking in account the personal data management objectives, to update the person's personal data, which is incomplete (**the right to correct**)*. This right is applied whenever the data, which we have is incomplete or not correct;
- *To terminate your personal data or to terminate your personal data management actions, with the exception of keeping (**the right to terminate and the right to "be forgotten"**)*. This right is applied in case the information we have is no longer needed to achieve specified objectives. This is applied when we manage your data according to your consent and you call off that consent, we manage your data according to a lawful interest and if (after your request) it is determined that your private interests are superior or in case the information is received in an unlawful way; This right can be implemented during a period while we analyze the situation, i.e. if you challenge the correctness of the information, if you are against the management of your personal data when it is done in a lawful way, we use the information unlawfully, but you are opposed to it being deleted, the information is not needed by us, but you demand it should be kept until the judicial dispute.
- *The right to demand that the personal data manager would limit the management of personal data in case one of the lawful reasons is present (**the right to limit**)*. You may not allow us to use your personal data for direct marketing purposes;
- *The right for the transfer of data (**the right to transfer**)*. This right can be implemented you if you have provided us your personal data and we manage it in an automatic way according to your consent or an agreement with you;
- *The right to disagree with the management of your personal data at any time, whenever such data management is executed for the public interest or the management of data is necessary for the proceeding of lawful interests of the data manager or a third party. In case the data manager processes personal data, he is obliged to prove that the data will be managed due to compelling legitimate reasons, which are higher than the interests of the data subject. (**the right to disagree**)*.
- *Provide a complaint to the State data protection inspectorate (www.ada.it)*.

We may not provide you with conditions to implement the above-mentioned rights, when we need to prevent crime, breach of professional or statutory ethics, and ensure an investigation or determination of a person, as well as in cases when we need to protect the rights and liberties of the data subject or other persons.

Your rights will be implemented only after you will confirm your identity – live or by e-signature.

Cookies, signals and similar technologies

In these privacy policies, the term “cookies” is used for cookies and other similar technologies.

Whenever you are visiting our webpage, we would like to provide you with such a content and functions, which would be adapted to your personal needs. We need “cookies” in order to do so. “Cookies” are small elements of information, which are saved at your internet browser. They help the data manager to recognize you as a previous visitor of a specific webpage and save your history of visiting the webpage and use this information to adapt the content for you personally. Cookies also help to ensure the proper functioning of webpages, allow supervising the duration and frequency of webpage visiting, and collect statistical data regarding the number of webpage visitors. By analyzing this data, we can improve our webpage and make it more convenient to use for you.

We bring your attention to the fact that our social network accounts are subjected to corresponding social network cookie policy.

Contact us

In case you have noticed some discrepancies in these privacy policies, a security breach on our webpage or you have other questions, related to your personal data management, please address us in one of the following ways: by mail UAB “Rubineta”, Savanorių av. 180, Vilnius.

E-mail: info@rubineta.com or administracija@rubineta.com

By telephone: +37068706192

Final provisions

This privacy policy is revised at least once per two years. After updating the privacy policy, we will inform you about the most essential (according to our view) changes by publishing the announcement on a specific webpage. In case you will connect or use your provided content and/or services after the publication of such an announcement, we will hold it, that you agree with our new requirements, specified in the update.

This privacy policy has been reviewed last time on 7th of September, 2018.

This policy is accessible for all interested parties and is published on the following webpages: www.rubineta.com, b2bru.rubineta.com and b2ben.rubineta.com.